

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GENERIC PHARMACEUTICALS
PRICING ANTITRUST LITIGATION**

**MDL 2724
16-MD-2724
HON. CYNTHIA M. RUFE**

THIS DOCUMENT RELATES TO:

AHOLD USA, INC.

**STIPULATION OF VOLUNTARY DISMISSAL
OF DIRECT PURCHASER PLAINTIFF AHOLD USA, INC.**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties and their respective counsel that, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), plaintiff Ahold USA, Inc. (“Ahold”) voluntarily dismisses all claims asserted in this multidistrict litigation. With this dismissal, Ahold agrees that it will not hereafter commence any action arising out of the facts and circumstances alleged in this litigation against any defendant in this litigation, or otherwise seek to serve as a plaintiff or class representative on behalf of the direct purchaser class in this litigation, but will remain an absent class member of the proposed class or any certified class. The defendants agree that they will not seek any further discovery from Ahold as relating to its commencement or participation as a plaintiff in this litigation, proposal to serve as a class representative, or the voluntary dismissal herein.

All parties to this stipulation shall bear their own costs.

Dated: June 5, 2020

Respectfully submitted,

/s/ Thomas M. Sobol

Thomas M. Sobol
David S. Nalven
Hagens Berman Sobol Shapiro LLP
55 Cambridge Parkway
Cambridge, Massachusetts 0214 2
617-482-3700
617-482-3003 (facsimile)
tom@hbsslaw.com
davidn@hbsslaw.com

Attorneys for Ahold USA, Inc.

/s/ Jan P. Levine

Jan P. Levine
PEPPER HAMILTON LLP
3000 Two Logan Square
Eighteenth & Arch Streets
Philadelphia, PA 19103-2799
Tel: (215) 981-4000
Fax: (215) 981-4750
levinej@pepperlaw.com

/s/ Sheron Korpus

Sheron Korpus
KASOWITZ BENSON TORRES LLP
1633 Broadway
New York, New York 10019
Tel: (212) 506-1700
Fax: (212) 506-1800
skorpus@kasowitz.com

/s/ Chul Pak

Chul Pak
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
1301 Avenue of the Americas, 40th Fl.
New York, NY 10019
Tel: (212) 999-5800
Fax: (212) 999-5899
cpak@wsgr.com

/s/ Devora W. Allon

Devora W. Allon
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022-4611
Tel.: (212) 446-4800
Fax: (212) 446-4900
devora.allon@kirkland.com

/s/ Sarah F. Kirkpatrick

Sarah F. Kirkpatrick
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, D.C. 20005
Tel: (202) 434-5000
Fax: (202) 434-5029

skirkpatrick@wc.com

Defendants' Liaison Counsel

CERTIFICATE OF SERVICE

I, Thomas M. Sobol, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's CM/ECF system. Those attorneys who are registered CM/ECF users may access these filings, and notice of these filings will be sent to those parties by operation of the CM/ECF system.

Dated: June 5, 2020

/s/ Thomas M. Sobol
Thomas M. Sobol